

# **EXHIBIT D**

## **CHEVRON DECLARATION**



1           4.       I am over 18 years old. This Declaration is based upon my personal knowledge and/or  
2 upon my review of business records of Chevron.

3           5.       As stated in Chevron's 2024 Annual Report, Chevron believes that the future of  
4 energy is lower carbon. Chevron continues to take actions that attempt to help lower the carbon  
5 intensity of its operations while meeting the world's demand for energy. Chevron also supports  
6 well-designed climate policy. Chevron believes that policies seeking to reduce GHG emissions from  
7 products and services should do so on a lifecycle GHG intensity basis as this approach allows  
8 suppliers to differentiate themselves based on their carbon performance. In the transportation sector,  
9 specifically, Chevron supports technology neutral policies that cost-effectively drive GHG emission  
10 reductions, rather than policies that artificially pick winners and losers among various technology  
11 options to the detriment of consumers and effective climate policy.

12           6.       Relevant to Chevron's business, Congress recently exercised its authority under the  
13 Congressional Review Act ("CRA") to disapprove the Environmental Protection Agency's ("EPA")  
14 decisions to grant several waivers to California between 2023 and 2025. These waivers authorized  
15 California to enforce its Advanced Clean Cars II, Advanced Clean Trucks, and Omnibus Low NOx  
16 regulations. *See* 88 Fed. Reg. 20,688 (Apr. 6, 2023); 90 Fed. Reg. 642 (Jan. 6, 2025); 90 Fed. Reg.  
17 643 (Jan. 6, 2025).

18           7.       On June 12, 2025, the President signed joint resolutions of disapproval passed by  
19 both the House and the Senate disapproving of the waiver decisions. These resolutions lawfully  
20 nullified EPA's waiver grants to California, preventing the enforcement of California's Advanced  
21 Clean Cars II, Advanced Clean Trucks, and Omnibus Low NOx regulations.

22           8.       California's Advanced Clean Cars II, Advanced Clean Trucks, and Omnibus Low  
23 NOx regulations—had they not been nullified by Congress—would have empowered California and  
24 states that follow its lead to enforce rules that suppress the manufacture and sale of internal  
25 combustion engine vehicles, including through increasingly stringent NOx requirements and  
26 mandates for zero-emission vehicle sales.

9. California's regulations would have significantly decreased the demand for fuel sales, as the State recognizes,<sup>1</sup> and would have caused automakers to produce and sell more vehicles (than they otherwise would) that use no liquid fuel at all.

10. California's lawsuit seeks to resurrect those regulations. Chevron's interests would be harmed if that effort succeeded. By reducing demand for liquid transportation fuels, California's regulations would have a direct financial impact on Chevron by artificially skewing the market and reducing the sales that Chevron's subsidiaries would otherwise have made.

11. For example, Chevron's subsidiary Chevron U.S.A. Inc. operates five wholly owned refineries in the United States and has a total crude refining capacity in the U.S. of over one million barrels per day.<sup>2</sup> California's regulations would have directly impacted these operations by significantly reducing demand for this subsidiary's products.

12. CREG also produces and sells liquid transportation fuels, including bio-based renewable diesel and biodiesel, and operates multiple active biorefineries in the United States. CREG is one of the largest producers of biomass-based diesel by volume in the United States, as well as a producer and supplier of many other products. Bio-based renewable diesel and biodiesel can generally be used in a wide range of diesel engines and their use results in lower carbon intensity emissions on a lifecycle basis compared to petroleum diesel. California's regulations would reduce demand for these fuels as well.

13. California's regulations would also harm Chevron's subsidiaries' efforts to develop creative and effective ways to meet the world's energy needs. By forcing the shift towards electric

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<sup>1</sup> See California Air Resources Board, *Response to Comments on the Draft Environmental Analysis Prepared for the Advanced Clean Cars II Program* (Aug. 24, 2022) at 55 n.54, <https://perma.cc/BJS4-RSRV> (estimating the reduction of fuel sales by 15% by 2040); see also Ellen Robo, et al., *California Clean Trucks Program*, Env't Rsch. Mgmt. Grp. (2022) at 11, <https://perma.cc/7BNU-XRKS> (study of the Advance Clean Trucks program, estimating fuel sales to drop by over 40% by 2036).

<sup>2</sup> Chevron, *Delivering Higher Returns: 2023 Supplement to the Annual Report* 21, <https://www.chevron.com/-/media/shared-media/documents/2023-chevron-annual-report-supplement.pdf> (noting United States-Consolidated refinery capacities of 1,059,000 barrels per day at year-end 2023).

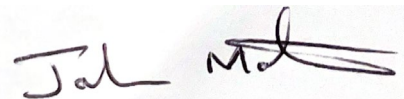
1 vehicles, despite public reports of slowing consumer demand,<sup>3</sup> California's regulations would have  
2 disincentivized other lower-carbon technologies that could help customers reduce GHG emission  
3 intensity. These include renewable natural gas made from dairy methane and the development of  
4 other novel catalysts to create renewable fuels, which could be used to lower the lifecycle carbon  
5 emissions of heavy-duty vehicles with internal combustion engines. California's proposed policies  
6 suppress these innovations by mandating a single technological outcome and thereby eliminating  
7 incentives to pursue alternative lower-carbon fuels.

8 14. If the disapproved waivers were reinstated, Chevron and its subsidiaries would face  
9 renewed harm. They would be subject to a fragmented, state-level regulatory scheme that disrupts  
10 the national market for transportation fuels. That disruption would impede Chevron's ability to plan  
11 and invest efficiently. It would threaten Chevron's business interests and would burden its  
12 customers. A decision maintaining the validity of the CRA disapprovals would prevent that harm.  
13 It would preserve a uniform and predictable regulatory framework.

14 I declare under penalty of perjury that the foregoing is true and correct to the best of my  
15 knowledge, information, and belief.

16 Executed this 6th day of August, 2025, in Santa Clara.

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JOHN MARTINI

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<sup>3</sup> Jennifer Ramsay, *Behind the EV Slowdown*, IndustryWeek (Jul. 1, 2025), <https://perma.cc/FEC6-UHEB>.